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 CAMILA RAMOS GARZON  
 and WOMEN BUILD WEB3

Attorneys for Plaintiffs  
 AMY SOON, AIKSHEE LOH, and BLU3  
 FOUNDATION, LLC d/b/a BLU3 DAO,  
 A Delaware Limited Liability Company

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

AMY SOON; AIKSHEE LOH; BLU3  
 FOUNDATION, LLC d/b/a BLU3 DAO, A  
 Delaware Limited Liability Company,

Plaintiffs,

v.

CAMILA RAMOS GARZON; WOMEN  
 BUILD WEB3,

Defendants.

Case No. 4:23-cv-05189-HSG

JOINT STIPULATION TO CONTINUE THE  
 COURT’S SCHEDULED CASE  
 MANAGEMENT CONFERENCE AND  
 HEARING DATE ON DEFENDANTS’  
 MOTION TO DISMISS (PURSUANT TO  
 L.R. 6-2); ORDER

Judge: Hon. Haywood S. Gilliam, Jr.  
 Date: June 12, 2025  
 Time: 2:00 p.m.  
 Crtrm.: 2

Action Filed: October 11, 2023

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs AMY SOON, AIKSHEE LOH, and  
 BLUE3 FOUNDATION, LLC d/b/a BLUE3 DAO (“Plaintiffs”) and Defendants CAMILA  
 RAMOS GARZON and WOMEN BUILD WEB3 (“Defendants”), (collectively, the “Parties”)  
 through their respective counsel of record, hereby jointly stipulate for an Order moving the  
 Court’s previously scheduled Case Management Conference on June 12, 2025, and the June 12,

1 2025 hearing on Defendants' Motion to Dismiss. [ECF No. 35].

2 WHEREAS, Plaintiffs filed the Complaint on October 11, 2023. [ECF No. 1].

3 WHEREAS, on February 27, 2025, Plaintiffs filed an affidavit of service showing that  
4 service was effectuated on Defendants on February 27, 2025. [ECF No. 22]. Defendants'  
5 deadline to respond to the Complaint was March 20, 2025.

6 WHEREAS, the Parties stipulated on March 14, 2025, to an extension of Plaintiffs'  
7 responsive pleading deadline to April 10, 2025. [ECF No. 24].

8 WHEREAS, Defendants filed a motion to dismiss and motion to strike the Complaint on  
9 April 10, 2025, and set a hearing date for May 15, 2025. [ECF No. 35].

10 WHEREAS, on April 15, 2025, the Parties stipulated to an extension of the briefing  
11 deadlines set by the court related to Defendants' Motion to Dismiss. Relatedly, the Parties  
12 stipulated to continuing the hearing date on Defendants' Motion to Dismiss from May 15, 2025 to  
13 June 12, 2025. [ECF No. 42].

14 WHEREAS, the Initial Case Management Conference in this action is scheduled for June  
15 12, 2025, to be held at the same time as the hearing on Defendants' Motion to Dismiss. [ECF No.  
16 50].

17 WHEREAS, Plaintiffs have previously requested several extensions related to the deadline  
18 to effectuate service on Defendants, which the Court granted. [See ECF Nos. 10, 11, 14, 15, 17,  
19 19, 20, 21, 40, and 42].

20 WHEREAS, Mr. Salvina has a personal conflict June 12, 2025 through June 13, 2025, that  
21 will prevent him from attending both the Initial Case Management Conference and the hearing on  
22 Defendants' Motion to Dismiss. See Declaration of Benjamin D. Salvina ("Salvina Decl."), ¶ 11.

23 WHEREAS, counsel for the Parties conferred on and around May 22, 2025, and agreed to  
24 stipulate to continue both the Initial Case Management Conference and the hearing on Defendants'  
25 Motion to Dismiss from June 12, 2025, to July 17, 2025, to allow Plaintiffs' counsel with  
26 decision-making authority to attend. See Salvina Decl., ¶ 12.

27 WHEREAS, good cause exists to continue the Initial Case Management Conference and  
28 the hearing on Defendants' Motion to Dismiss. See Salvina Decl., ¶¶ 11-13.

1           THEREFORE, in accordance with Civil L.R. 6-2 and Civil L.R. 7-12, the undersigned  
2 Parties stipulate as follows:

- 3           1.       The Initial Case Management Conference is continued to July 17, 2025, at 2:00  
4 p.m., in Courtroom 2; and  
5           2.       The hearing on Defendants' Motion to Dismiss is continued to July 17, 2025, at  
6 2:00 p.m., in Courtroom 2, subject to the Court's availability.

7           IT IS SO STIPULATED.

8 DATED: May 23, 2025

KARPF, KARPF & CERUTTI, P.C.

9  
10 By: /s/ Benjamin D. Salvina  
11 Benjamin D. Salvina, Esq. (*pro hac vice*)  
12 Attorneys for Plaintiffs  
13 AMY SOON, AIKSHEE LOH, and BLU3  
14 FOUNDATION, LLC d/b/a BLU3 DAO,  
A Delaware Limited Liability Company

15 DATED: May 23, 2025

HOGUE, FENTON, JONES & APPEL, INC.

16  
17 By: /s/ Manda N. McElrath  
18 Alison P. Buchanan  
19 Manda N. McElrath  
20 Attorneys for Plaintiffs  
21 AMY SOON, AIKSHEE LOH, and BLU3  
FOUNDATION, LLC d/b/a BLU3 DAO,  
A Delaware Limited Liability Company

22 DATED: May 23, 2025

HOLLAND & KNIGHT LLP

23  
24 By: /s/ Christine Walz  
25 Christine Walz  
26 David I. Holtzman  
27 Attorneys for Defendants  
28 CAMILA RAMOS GARZON  
AND WOMEN BUILD WEB3

**CIVIL LOCAL RULE 5-1(H)(3) ATTESTATION**

Pursuant to Local Rules 5-1(i)(3), I, Amanda N. McElrath, hereby attest under penalty of perjury that concurrence in the filing of this document has been obtained from all signatories.

DATED: May 23, 2025

HOGUE, FENTON, JONES & APPEL, INC.

By: /s/ Manda N. McElrath  
Manda N. McElrath  
Attorneys for Plaintiffs  
AMY SOON, AIKSHEE LOH, and BLU3  
FOUNDATION, LLC d/b/a BLU3 DAO,  
A Delaware Limited Liability Company

**ORDER**

Pursuant to the stipulation of the parties:

1. The Initial Case Management Conference is continued to July 17, 2025, at 2:00 p.m., in Courtroom 2; and

2. The hearing date on Defendants' Motion to Dismiss/Strike is continued to July 17, 2025, at 2:00 p.m., in Courtroom 2.

IT IS SO ORDERED.

DATE: 5/23/2025

  
Hon. Haywood S. Gilliam, Jr.